

GAIA Telecom LLC

Robocall Mitigation Plan

GAIA Telecom is committed to cooperating with the Federal Communications Commission (FCC), law enforcement and the industry traceback consortium in investigating and putting a halt to illegal robocalls which originate from or transit the GAIA network, terminating in the United States and territories. In alignment with the rules and regulations of the foregoing, GAIA explicitly commits to respond within 24 hours to all traceback requests from the above-named entities.

Mitigation Protocols

Customer and Call Screening

All customers are required to provide the following information for identification purposes to begin service:

1. Legal Company Name
2. DBA
3. Primary and Secondary Contact(s) where applicable
4. Service Address
5. Type of Business

GAIA's intake process includes a review of the customer's particular line of business, calling patterns, services requested, including numbering needs. ANI from voice service provider's calls transiting the GAIA network is constrained to either the customer-allocated subset of the numbering pool assigned directly to GAIA, or those assigned to a contracted terminating carrier, and which are provisioned by GAIA either manually or programmatically via API. GAIA-originating calls are properly attested via STIR/SHAKEN and GAIA-terminated calls are verified prior to termination. Domestic voice service providers are vetted via lookup in the FCC 499 filer database and Robocall Mitigation Database (RMD) prior to account activation. Provider must have a filing in the RMD and have not been de-listed pursuant to enforcement action.

While our Terms and Conditions provide remedies for using our services in any way prohibited by law, these Terms and Conditions specifically define and prohibit the practice of robocalling, spam calling and any other form of calling prohibited by law. Customers failing to abide by these conditions will face suspension or termination for applicable violations.

Services

To help minimize the risk of robocalling, GAIA Telecom employs the following services:

1. GAIA partners with its origination and termination service providers to implement STIR/SHAKEN attestation and verification services for calls traversing their respective networks.
2. GAIA verifies ANI on PSTN-terminating calls against a database which correlates a given customer/billing account with assigned numbers, ensuring customer can only use numbers provisioned for their account(s).
3. Customer may request or self-serve to block calls from any given caller id.
4. While some customer types may operate a dialer and have an ASR and SDP typical of this usage, such customers are screened for permitted nature of business and calling and specifically warned against prohibited call types. Customers whose calls have a sudden change in traffic pattern or who request increase in channels or calls-per-second may be required to justify their usage, and any usage deemed suspicious or questionable may be denied.

Monitoring

GAIA Telecom maintains call records, including time-series metrics which can suggest suspicious call patterns both in real-time and forensically. Suspicious call patterns include but are not limited to intermittent burst of high activity or low call completion rates, short call times, or calls of these types which are outside of customer's established and expected calling patterns.

Traceback and Enforcement

GAIA Telecom agrees to cooperate with the traceback community, including FCC, law enforcement and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. GAIA will provide resources to any such request to ensure prompt response. When notified by the Commission through its Enforcement Bureau that a Final Determination Order has been issued finding that an upstream provider has failed to comply with 47 C.F.R. § 64.1200(n)(2), GAIA shall block and cease accepting all traffic received directly from the upstream provider beginning 30 days after the release date of the Final Determination Order, or sooner at GAIA's discretion, provided that provider has failed to effectively mitigate illegal traffic within 48 hours of notice by the Commission, or fails to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls.